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BY ECF:

Hon. Jesse M. Furman, U.S.D.J.
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: Anika Edrei, et al. v. City of New York, et al.,
16 Civ. 1652 (JMF) (BCM)

Your Honor:

I am an attorney assigned to the defense of the above referenced matter, and I write to consent to Plaintiffs' emergency application to the Court requesting that the Court grant additional time before dismissing this action for the parties to avail themselves of a final settlement conference with Magistrate Judge Moses. (Dkt. No. 135). Defendants oppose Plaintiff's alternative request that discovery in this matter be re-opened.

By way of background, following two settlement conferences before the Hon. Barbara C. Moses in 2020 and in early 2021, the parties reached a global settlement of Plaintiffs' claims. The parties still have agreement on all material terms, but an area of dispute remains as to the proper mechanism for redressing potential breach of the settlement agreement. As a result, a brief extension of time before the Court's Order of dismissal with prejudice takes effect is needed so that this last issue may be resolved with the assistance of Judge Moses.

Defendants also believed that a settlement had been reached based on agreed-upon terms. However, plaintiff has since added a material terms that was not previously discussed at any settlement conference or otherwise. Nevertheless, defendants are willing to attend and participate in good faith in another settlement conference with Magistrate Judge Moses.

Thank you for your consideration of this matter.

Respectfully Submitted,

Peter W. Bocker /s/
Peter W. Bocker, Esq.
Assistant Corporation Counsel

cc: All Counsel of Record (via ECF)